



U.S. Department of Justice

950 Pennsylvania Avenue NW  
Washington, D.C. 20530

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May 19, 2025

By ECF

The Honorable Dale E. Ho  
United States District Judge  
U.S. District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: United States v. M/Y Amadea, No. 23-cv-9304 (DEH)

Dear Judge Ho:

The Government's Reply in support of its motion for a cost bond is due May 23, 2025. Pursuant to Your Honor's Individual Rule 4(b)(ii), the Reply is limited to ten pages. The Government respectfully requests permission to file up to 15 pages (*i.e.*, five extra pages) in order to adequately brief the points raised in Claimants' Opposition brief. Notably, Claimants' Opposition effectively opposes two Government briefs: the Government's opening bond brief (ECF No. 483) and the Government's brief on storage costs (ECF No. 477-2). To fully Reply on both issues, the Government requests five extra pages.

The Government conferred with Claimants' counsel on this request, who indicated they would consent to it only if the Government consented to Claimants filing a five-page sur-reply. The Government declined. The Government does not believe a request for five extra Reply pages should be conditioned on a sur-reply, especially when a sur-reply would extend a briefing schedule that has already gone on for over a month.

We thank the Court for its consideration of this request.

Respectfully submitted,

JAY CLAYTON  
United States Attorney  
Southern District of New York

By: /s/ Dominika Tarczynska  
DOMINIKA TARCZYNSKA  
RACHAEL DOUD

Assistant United States Attorneys

MARGARET A. MOESER  
Chief  
Money Laundering and Asset Recovery  
Section, Criminal Division  
U.S. Department of Justice

By: /s/ Joshua L. Sohn  
JOSHUA L. SOHN  
D. HUNTER SMITH  
LINDSAY P. GORMAN  
Trial Attorneys  
Money Laundering and Asset Recovery  
Section

cc: Claimants' counsel (by ECF)